

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

FRANK LONG, JOSEPH SHIPLEY, and
MICHAEL WHITE, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

SOUTHEASTERN PENNSYLVANIA
TRANSPORTATION AUTHORITY,

Defendant.

CIVIL ACTION NO. 2:16-cv-1991-PBT

**PLAINTIFFS' RESPONSE TO DEFENDANT SOUTHEASTERN PENNSYLVANIA
TRANSPORTATION AUTHORITY'S MOTION FOR LEAVE TO FILE REPLY**

Plaintiffs write in response to Defendant Southeastern Pennsylvania Transportation Authority's ("SEPTA") Motion for Leave to File Reply. *See* ECF No. 28. Plaintiffs do not object to SEPTA's request for a reply brief as to the topics identified in SEPTA's memorandum of law. However, Plaintiffs object to SEPTA's statement that Plaintiffs raised an invasion of privacy argument for the first time in their Opposition brief, given that SEPTA preemptively addressed this argument in its Moving brief. *See* ECF No. 25-2 (Defendant SEPTA's Memorandum of Law in Support of Its Motion to Dismiss the First Amended Class Action Complaint) at 7.

Dated: July 28, 2016

Respectfully submitted,

/s/ Ossai Miazad

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Plaintiffs' Response to Defendant Southeastern Pennsylvania Transportation Authority's Motion for Leave to File Reply, was served on this 28th day of July, 2016, upon counsel of record via the Court's ECF filing system.

/s/ Ossai Miazad
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